

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE:

Andre Bisasor
Debtor,

Chapter 13
Case No.: 15-13369

MOTION TO EXTEND TIME

I hereby request an extension of time to provide updated schedules I and J as it relates to my request to waive appellate fees on the matters related to Greystar. This request is based on the following:

- 1) My attorney, David G. Baker has been hospitalized once again and will continue to be hospitalized this week. I have thus been unable to confer with him regarding matters related to the proper completion of my updated schedules.
- 2) I need more time to complete my transition and to determine the impact on my schedules. Without this additional time to complete my transition, the information provided in updated schedules I and J will likely be incomplete and inaccurate, which will be further compounded by the unavailability of my attorney.
- 3) Greystar and myself have been engaging in full settlement negotiations to settle this matter and to reach a global resolution of all issues. We are near reaching a settlement and need a little more time to finalize agreement. Therefore, I am asking for a 20 day extension of time until 12/17/15. This will potentially save on the resources of the court/the parties and redound to judicial economy, if the matter is settled and disposed of in a manner that spares the need for further litigation and appeals on this matter. If

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